

CANAAN HOLDINGS LLC

REGULATORY COMPLIANCE AND REPORTING PROTOCOLS

Public-facing institutional policy | Version 1.0 | October 9, 2026

Scope: Holdings and applicable subsidiaries, subject to verified formation, licensing and service status.

01. Entity scope and legal separation

This policy addresses Canaan Holdings LLC (Delaware); Canaan Sports Management LLC (Delaware, Pennsylvania foreign qualification status to be verified); Canaan Family and Talent Services LLC (Pennsylvania); Canaan Business Advisory LLC (Delaware, exact registered name to be verified); Canaan Private Wealth (formation and adviser registration status to be verified); and the proposed Canaan Athlete Enterprise Registry (CAER), whose legal entity and intellectual-property arrangements remain subject to confirmation. Each entity is a separate legal person only to the extent duly formed. Neither common ownership nor common branding merges their obligations. Each engagement, invoice, contract and regulatory representation must identify the actual contracting entity.

02. Application and interpretation

This public policy states intended governance and disclosure standards. It does not amend any operating agreement, engagement letter, subscription agreement, privacy notice, or mandatory regulatory filing. Where requirements conflict, applicable law and binding agreements control. No website statement establishes a registration, license, insurance coverage, audit or independent oversight that has not actually been obtained.

03. Accountability and review

The Holdings managing member is accountable for designating an owner for each control, documenting approval, maintaining version history, and reviewing the policy at least annually and following material changes. Delegated executives must escalate significant exceptions promptly. Internal records of reviews and exceptions are not automatically public.

04. Investor and client inquiries

Requests for material information should be directed through the official website contact channel. Confidential financial, client, employee and trade-secret information will be released only when authorized and lawful. An inquiry does not create an advisory, fiduciary or investment relationship.

05. Regulatory mapping

Maintain an entity-by-entity obligations register covering formation, foreign qualification, tax, licensing, employment, consumer protection, contracts, data protection, advertising and industry-specific rules. Determine obligations by actual activity and jurisdiction, not branding alone.

06. Sports and NIL compliance

Screen athlete-agent registration requirements, state NIL rules, institutional and conference policies, intellectual-property permissions, compensation restrictions, athlete eligibility implications and applicable collective-bargaining or league rules. Obtain counsel review before acting in new jurisdictions.

07. Wealth and securities boundaries

No entity or representative may hold out as registered, manage securities accounts, solicit investments or give regulated advice without the necessary registration, exemption and supervisory framework. Where applicable, assess SEC or state adviser rules, Form ADV, privacy, marketing, books and records and cybersecurity obligations.

08. Business advisory boundaries

Fractional CFO and consulting engagements must state scope, deliverables, independence limitations and reliance on client-provided information. Do not describe consulting deliverables as audited, reviewed or attested financial statements absent appropriately licensed professional services.

09. Data protection and sensitive identifiers

Use data minimization, role-based access, multifactor authentication, encryption where appropriate, vendor diligence, secure disposal and breach response. Social Security numbers, dates of birth, addresses and athlete records require heightened controls. Applicable state privacy and breach-notification requirements must be assessed.

10. Compliance calendar

Maintain a calendar of registration renewals, annual reports, tax filings, insurance renewals, contractual reporting, client deliverables, training, access reviews and record-retention deadlines. Each item must have an accountable owner and evidence of completion.

11. Incident escalation

Immediately contain suspected fraud, privacy incidents, material financial misstatements, unauthorized representation and licensing issues; preserve evidence; involve appropriate counsel and specialists; assess notifications and regulatory deadlines; document corrective actions.

12. Investor reporting

Reports must reconcile to entity books, identify reporting periods and assumptions, describe material risks and related-party activity, and avoid misleading selective metrics. The cadence and delivery rights depend on operative investment documents.

13. Vendor and technology oversight

Before onboarding material vendors, assess security, financial resilience, subcontractors, data use, incident reporting, termination assistance and intellectual-property ownership. Reassess high-risk providers periodically.

14. Training, testing and remediation

Provide role-based onboarding and annual training. Perform risk-based testing, maintain findings logs, assign remediation owners and verify closure. Preserve records under applicable retention rules.

Implementation and legal precedence

This publication-ready policy is a governance statement, not a certification of implementation. Before website publication, management must confirm entity names, formation and registration status, actual business practices, approval authority, contractual consistency and legal review. No provision represents that any specific internal control is already operating unless separately verified.